

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY BUCKS HOLDINGS LLC,

*Debtor.*

Chapter 7

Case No. 23-10756 (KBO)

MARC ABRAMS,

In his capacity as Chapter 7 Trustee of Lucky Bucks Holdings LLC and as assignee,

*Plaintiff,*

Adversary Proceeding

Adv. Proc. No. 24-50130 (KBO)

v.

TRIVE CAPITAL MANAGEMENT LLC, TRIVE CAPITAL FUND III LP, TRIVE CAPITAL FUND III-A LP, TCFIII LUCK LP, TCFIII LUCK SPV LP, TCFIII LUCK ACQUISITION LLC, SHRAVAN THADANI, LUCKY BUCKS VENTURES, INC., ANIL DAMANI, SOUTHERN STAR GAMING LLC, SHAFIK KASSAM, JAMES BOYDEN, RYAN BOUSKILL, RYAN C BOUSKILL PROFESSIONAL CORPORATION, 2786692 ONTARIO INC., MANU SEKHRI, STEPHANIE LIPPA, and HASSAN IJAZ,

*Defendants.*

**MANAGEMENT DEFENDANTS' MOTION  
TO DISMISS THE FIRST AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(6) and Fed R. Bankr. P. 7012(b), Defendants Manu Sekhri, James Boyden, Ryan Bouskill, Ryan C. Bouskill Professional Corporation, Hassan Ijaz, 2786692 Ontario Inc., and Stephanie Lippa (collectively, the “Management Defendants”) respectfully move to dismiss the *First Amended Complaint* [D.I. 58]. The grounds for this motion are fully set forth in the Management Defendants’ *Brief in Support of Management Defendants’*

*Motion to Dismiss the First Amended Complaint* filed contemporaneously herewith and upon the papers, records and pleadings on file with the Court.

Dated: March 24, 2025  
Wilmington, Delaware

**POTTER ANDERSON & CORROON LLP**

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2786692 Ontario Inc., and Stephanie Lippa*